

3. I have reviewed the time and fees billed by Phelps Dunbar LLP and the firm has provided the services described above, the value of which is calculated on an hourly basis at the normal hourly rate of each attorney or paralegal.¹

4. I have made myself familiar with rates charged by attorneys in the District of Wyoming; and both the rates charged and the time expended were fair and reasonable in light of the experience and background of the attorneys involved, the complexity of the legal and factual issues, and the prevailing rates that attorneys charge in the Wyoming area² and for the nature of this litigation.

5. In connection with the preparation, filing and additional briefing related to the *Motion to Enforce Settlement Agreement and for Reasonable Attorneys' Fees*, total fees in the amount of \$24,325.00 have been incurred through the hearing of the Motion. Such fees represent partner attorney time of 24.30 hours at \$360 per hour, partner attorney time of 15.20 hours at \$260 per hour, associate attorney time of 41.70 hours at \$230 per hour, and paralegal time of 11.30 hours at \$180.00 per hour. It is my opinion that this Affidavit is legally sufficient evidence of both the reasonable hours worked, and a reasonable hourly rate.

6. I certify that all time entries pertinent to the instant action have been reviewed and, to the extent possible, all time entries not related to the *Motion to Enforce Settlement Agreement* have been excised. The total amounts included in this Affidavit reflect a conservative estimate of time billed in prosecuting the *Motion to Enforce*.

7. In accordance with the Court's instructions, an itemized breakdown of the time and relevant invoice entries have been attached *en globo* as Exhibit A.

¹ January 2025 invoices have not been finalized or sent out as of the date of this affidavit.

² See *Large v. Fremont County*, No. 05-CV-0270, 2013 WL 12342417, at *7 (D. Wyo. Sept. 20, 2013) (noting "out-of-state counsel may be compensated at rates over the local . . . billing rates for legal service" and awarding \$425.00/hour to the "lead attorney," \$300/hour, \$250/hour, and \$210/hour to the non-lead attorneys).

8. The matters I set forth in this Affidavit are true and correct and based upon my personal knowledge, information and belief.


CHRISTOPHER K. RALSTON

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 24TH DAY
OF JANUARY, 2025.


NOTARY PUBLIC


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